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5 Attorneys for Plaintiff,
6 Lycurgan, Inc.

7
8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10
11 LYCURGAN, INC. d/b/a ARES
ARMOR,

12 Plaintiff,

13 v.

14 B. TODD JONES, in his official
capacity as Head of the San
Diego Bureau of Alcohol,
15 Tobacco, Firearms and
Explosives; and DOES 1-10,
16 Defendants.

CASE NO. 14-CV-1679 JLS (BGS)

DECLARATION OF SCOTT A.
MCMILLAN REGARDING
DECLARATION OF DANIEL E.
BUTCHER OF DECEMBER 16, 2014.

Judge: Hon. Janis L. Sammartino
Dept.: 4A

Date: UNDER SUBMISSION

17 **DECLARATION OF SCOTT A. MCMILLAN**

18 I, Scott A. McMillan, declare:

19 1. I am Plaintiff Lycurgan's lawyer in the above captioned case. If
20 called before this court, I could and would testify competently to the following
21 from my own personal knowledge:

22 2. Since the U.S. Attorney's for the Eastern District of California
23 does not need the EP80 unfinished lower receivers seized from Lycurgan, on
24 behalf of my client – I respectfully request that those be released immediately.
25 There are Eight "shopping days" until Christmas.
26

1 3. Lycurgan could sell those EP80 unfinished receivers and mitigate
2 its damages.

3 I declare under the penalty of perjury according to the laws of the United
4 States that the foregoing is true and correct and that this declaration was executed
5 on December 16, 2014, in the City of La Mesa, County of San Diego, State of
6 California.

7 /s/ Scott A. McMillan

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9 _____
10 Scott A. McMillan
11 Attorneys for Lycurgan, Inc.
12 Plaintiff
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